

To: Chan, Janice[Chan.Janice@epa.gov]
Cc: Robert Phalen[rphalen@hickmanseggs.com]
From: Shari Yeatts
Sent: Fri 10/7/2016 6:31:03 PM
Subject: HER Response to - EPA follow up to 114 Request
[DOC # 204 Cover Letter for EPA follow up to 114 Request.docx.pdf](#)
[DOC # 0100 engineering designs air flow rates all sizes.pdf](#)
[DOC # 0101 engineering designs air flow rates AS 1-10.pdf](#)
[DOC # 200 feed mill process flow.pdf](#)
[DOC # 201 Dust Control Policy.docx.pdf](#)
[DOC # 202 BMP's for waste water.docx.pdf](#)
[DOC # 203 process stream for airflow.docx.pdf](#)
[DOC # 205 Process Stream for fertilizer.docx.pdf](#)
[DOC # 206 Clarification to Response 2.b & 2.c.pdf](#)
[DOC # 207 Clarification to Response 2.e & 2.f. docx.pdf](#)
[DOC # 208 Clarification to Response 2.h.pdf](#)
[DOC # 209 Clarification to Response for Request #12.docx.pdf](#)
[DOC # 210 Clarification to Request 6.pdf](#)
[Statement of Certification EPA follow-up to 114 Request.pdf](#)
[DOC # 211 Question 2D - Responses to 2.pdf](#)
[DOC # 212 Question 2d Attachment #1- Tonopah Facility H2S revised locations.pdf](#)
[DOC # 213 Question 2d Attachment #2 - Arlington Facility H2S revised locations.pdf](#)
[DOC # 214 Question #4 - Attachment #2 - Daily Windrow Turning Log.pdf](#)
[DOC # 215 Question #4 - Attachment #1 \(Organic System Plan\).pdf](#)
[DOC # 216 Question 4 - Request 5.pdf](#)
[DOC # 217 Question 3 - Response to 4.f.pdf](#)
[DOC # 218 Question #6 - Reponse to Request #8.pdf](#)
[DOC # 219 Question #6a and #6b, Request #8 - Fugitive Emission Inspection – Outdoor Location.pdf](#)
[DOC # 221 Question #6a and #6b, Request #8 -Hickman's Farmers Choice Insp 10.4.16 Updated.pdf](#)

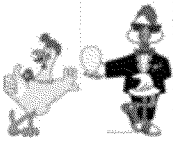
Hi Janice,

Thank you for the call Monday, your time was appreciated and it helped us to clarify the questions in the below request.

Attached to this email are the documents responding to the email sent September 16, 2016. The memory stick containing all supporting documents, to include DOC # 220, the video, will be mailed out first thing Monday morning, 10/10/2016. You should receive no later than Wednesday 10/12/2016.

If you have any additional questions please contact Robert Phalen or myself anytime.

Respectfully,



Shari Yeatts

Compliance Manager

Cell Phone - 623-692-8451

Officer Phone- 623-872-2358

From: Chan, Janice [mailto:Chan.Janice@epa.gov]
Sent: Thursday, September 22, 2016 1:17 PM
To: Shari Yeatts <syeatts@hickmanseggs.com>
Cc: Robert Phalen <rphalen@hickmanseggs.com>
Subject: RE: EPA follow up to 114 Request

Hi Shari and Robert:

Robert, thank you for calling me earlier today. Upon considering receiving responses to my follow-up inquiry by email and by hard copy, I would like to receive the responses by both email and hard copy rather than just email if still possible. In our original 114 letter, we had included a copy of the Statement of Certification. Please include that in your response(s).

I look forward to speaking with you on October 3 to discuss any questions regarding my questions.

Thank you,

Janice

From: Shari Yeatts [<mailto:syeatts@hickmanseggs.com>]
Sent: Friday, September 16, 2016 3:40 PM
To: Chan, Janice <Chan.Janice@epa.gov>
Cc: Robert Phalen <rphalen@hickmanseggs.com>
Subject: RE: EPA follow up to 114 Request

Hi Janice,

Robert is traveling back from one of our other facilities today. We will review this request first thing Monday morning and get back with you regarding scheduling a call the early part of next week.

Have a wonderful weekend,

Shari Yeatts

From: Chan, Janice [<mailto:Chan.Janice@epa.gov>]
Sent: Friday, September 16, 2016 3:35 PM
To: Shari Yeatts <syeatts@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>
Subject: EPA follow up to 114 Request

Dear Ms. Yeatts and Mr. Phalen,

Thank you for your responses to EPA's June 1, 2016 Request for Information under Section 114 of the Clean Air Act (114 Request) to Hickman's Egg Ranch, Inc. (hereinafter "Hickman" or "you"). We have some questions to follow-up and clarify the answers you provided. I would be happy to discuss these questions with you on a conference call. To facilitate your response, the questions below are presented in the same order as the questions in our original 114 Request.

1. **This question pertains to Request 1.** Clarify the identities of all the process streams for feed, waste water, dust control, air flow, and other processes applicable to the raising of poultry, processing of eggs, and manufacturing and processing of compost and fertilizer.

2. These questions are for Request 2.

a. **Responses to 2.b. and 2.c.** Your responses used the language “date construction began” and “birds first installed”. Does this language correspond to when the construction of each facility commenced (per Request 2.b.) and when the construction was completed (per Request 2.c.)?

b. **Responses to 2.e.** we asked for information regarding the design capacity of each facility in terms of maximum number of poultry. For 2.f., we asked for the maximum number of poultry actually housed at any time since the construction through May 31, 2016. In document DOC # 0008, does the column labeled “MAX # of HENS PER House EVER Housed” reflect the maximum number of poultry based on the design capacity per Request 2.e, or does that column respond to the actual number birds housed per Request 2.f.? Is each facility designed to house more poultry than indicated in DOC # 0008?

c. **Responses to 2.h.** We asked for engineering designs or calculations used for air flow rates or volumes. The responsive document DOC # 0009 does not include engineering designs or calculations use for air flow rates or volumes.

d. **Responses to 2.i.** We asked for information regarding equipment used to control, reduce or mitigate emissions of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia. The responsive document DOC # 0010 includes a standard operation procedure (SOP) for the sampling and hydrogen sulfide (H₂S) and corrective actions for samples indicating noncompliance. The response seems insufficient in responding to the request. For the purpose of clarity, does Hickman have equipment used to control, reduce or mitigate emissions from the poultry houses, including equipment to control, reduce or mitigate the emission of H₂S? What is the compliance plan used as a corrective action in the event there is a sample indicating noncompliance for H₂S, as referenced to in DOC # 0010?

3. The following question pertains to Request 4

a. **Responses to 4.f.** We asked for equipment used to control, reduce or mitigate emissions of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia for thermal processing of chicken litter and/or manure at the Facilities[1]. Hickman responded with DOC # 0018, which indicates that two rotary dryers manufactured by Vulcan Systems (identified in DOC # 14 to in response to 4.c.) are used to control, reduce or mitigate emissions from thermal processing of chicken litter and/or manure. Do these dryers have any equipment to control emissions from the stack? Also, specify whether there are any additional equipment used to control, reduce or mitigate emissions (if any) from other sources identified under 4c in DOC # 0018, identified sources are identified below:

i. California Pellet Mill Model 3020

- ii. California Pellet Mill Model 7000
- iii. Seattle Boiler
- iv. Engineered Systems & Equipment EX 10 Drying

Oven

4. The following question pertains to Request 5.

a. **Responses to 5.e.** We asked for the equipment used for manure turning, including number and purpose of each type of vehicle / device. Hickman provided DOC # 0018. Specify the number of equipment.

b. **Responses to 5.f.** We asked for engineering designs or calculations used for air flow rates or volumes for the manure barns, manure windrows, manure turning, and related buildings and structures. Hickman responded with DOC # 0018, which provides emissions estimations for NO_x, CO, SO₂, TOCs, PM, and CO₂ for the rotary dryers manufactured by Vulcan Systems. Specify whether these are emissions from the engine from which the rotary dryer operates only. Does this include emissions from the rotary dryer's stack? Are there engineering designs or calculations used for air flow rates or volumes for the manure barns, for the manure windrows, and for the manure turning?

c. **Responses to 5.g.** We asked for a description of practices used to control, reduce or mitigate emissions from manure barns, manure windrows, manure turning and manure handling operations. Hickman responded with DOC # 0018, under 5g. Clarify whether Hickman uses emissions controls for emissions of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia from the manure.

5. **This question pertains to Request 6.** We asked Hickman to provide total monthly production of compost / fertilizer for each month from January 2011 through May 2016 for each Facility. Hickman responded with DOC # 19. However, DOC #19 does not identify this information for each of the Facilities. Also, explain the formula used referencing the "Max Number of birds". Is the "Amount of Birds" based on the "Max Number" of birds the maximum capacity which the facility can hold, or is it the maximum number of birds which Hickman has actually housed?

6. **This question pertains to Request 8.** We asked for results of all source testing conducted at the Facilities for emission of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia. Hickman provided DOC # 30, which includes only Hickman's Hydrogen Sulfide SOP, Hickman's Light Density & Ammonia Level Verification Policy, and light and ammonia readings from the barns dated February 15, 2016. The response seems insufficient in responding to the request.

a. Specify whether Hickman has any additional measurements from source testing from January 2011 through May 2016.

b. In addition, based on your responses, EPA understands that ADEQ has required monthly monitoring measurements from the rotary dryer covered under the recent Arizona Agricultural Best Management Practices (Ag BMP) permit provided to Hickman. Provide all copies of those measurements.

7. **This question pertains to Request 12.** We asked whether Hickman believes that the Facilities are subject to the Ag BMP requirements, and to explain the legal and factual basis for this position. Hickman provided DOC # 21. EPA understands that there was an inspection conducted by ADEQ on June 13, 2016, and that the Ag BMP procedures were reviewed with Hickman staff, and an Ag BMP permit was provided to Hickman on the same day. Provide a map situating the Hickman facilities in relation to the areas where the Ag BMP requirements apply under the Arizona SIP. In a narrative, explain the legal and factual basis for Hickman's coverage under the Ag BMP requirements.

These questions are related only to the 114 Request. At some point, I would also like to follow up with TRI related questions. I didn't want to make this message too complicated in mixing questions for both the 114 Request and TRI request.

Thank you,

Janice

Janice Chan

Environmental Protection Specialist

U.S. Environmental Protection Agency, Region 9

Enforcement Division

Air & TRI Section (ENF-2-1)

75 Hawthorne Street

San Francisco, CA 94105

P: 415-972-3308

F: 415-947-3519

Chan.Janice@epa.gov

CONFIDENTIALITY NOTICE: This transmission is intended to be delivered only to the named addressee(s) and may contain information that is confidential, proprietary, attorney work-product or attorney-client privileged. If this information is received by anyone other than the named addressee(s), please notify the sender immediately, by reply e-mail to chan.janice@epa.gov and/or by telephone (415) 972-3308, to obtain instructions as to the disposal of the transmitted material. In no event shall this material be read, used, copied, reproduced, stored or retained by anyone other than the named addressee(s), except with the express written consent of the sender or the named addressee(s).

[1] As defined in Enclosure 3 of the 114 Request dated June 1, 2016.